

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	§	
	§	Case No. 21-60090
SGR ENERGY, INC.,	§	
	§	Chapter 11
	§	
Debtor.	§	Subchapter V
	§	

**EMERGENCY MOTION FOR STATUS CONFERENCE**

EMERGENCY RELIEF HAS BEEN REQUESTED. A HEARING WILL BE CONDUCTED ON THIS MATTER ON \_\_\_\_\_, AT \_\_\_\_:00 P.M. (CENTRAL TIME) IN THE COURTROOM LOCATED AT 312 S. MAIN, VICTORIA, TX 77901. IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST EITHER APPEAR AT THE HEARING OR FILE A WRITTEN RESPONSE PRIOR TO THE HEARING. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

RELIEF IS REQUESTED AS SOON AS PRACTICABLE.

PLEASE NOTE THAT ON JUNE 30, 2021, THROUGH THE ENTRY OF GENERAL ORDER 2021-05, THE COURT INVOKED THE PROTOCOL FOR POST-COVID REOPENING PLAN.

IT IS ANTICIPATED THAT ALL PERSONS WILL APPEAR TELEPHONICALLY AND ALSO MAY APPEAR VIA VIDEO AT THIS HEARING.

AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG-DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153.

YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GOTOMEETING, THE COURT RECOMMENDS THAT YOU DOWNLOAD THE FREE GOTOMEETING APPLICATION. TO CONNECT, YOU SHOULD ENTER THE MEETING CODE "JUDGELOPEZ" IN THE GOTOMEETING APP OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE ON THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED, CLICK THE SETTINGS ICON ON THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

To the Honorable Christopher M. Lopez, U.S. Bankruptcy Judge:

COMES NOW, Munsch Hardt Kopf & Harr, P.C. (the "MHKH"), as proposed counsel for the debtor and debtor-in-possession in the above-styled chapter 11 proceeding (the "Bankruptcy Case"), and files this its *Emergency Motion for Status Conference* (the "Motion"), and in support thereof would respectfully show the Court as follows:

1. On November 15, 2021, the Debtor, through its proposed bankruptcy counsel MHKH, filed its *Voluntary Petition* [Doc. 1] (the "Petition") initiating the above-captioned Bankruptcy Case.

2. Pursuant to 11 U.S.C. §§ 1187(a) and 1116(1)(A)–(B), a “Balance Sheet” and “Statement of Cash Flows” were filed as attachments to the Petition. *See* Dkt. 1–2; 1–3. Further, the Petition was prepared and filed based on related financial information supplied by the Debtor.

3. On November 18, 2021, MHKH became aware that the Balance Sheet, Statement of Cash Flows, and certain other financial documents contained inaccuracies. MHKH has concerns that such inaccuracies cannot be immediately remedied by the Debtor.

4. Based on the above, in light of MHKH’s inability to file requisite first-day motions for the Debtor, and under MHKH’s duty of candor to the Court, MHKH respectfully seeks an immediate status conference and guidance from the Court.

Dated: November 18, 2021.

Respectfully Submitted,

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ John D. Cornwell  
John D. Cornwell  
Texas Bar No. 24050450  
Thomas D. Berghman  
Texas Bar No. 24082683  
700 Milam Street, Suite 2700  
Houston, Texas 77002  
Telephone: (713) 222-1470  
Facsimile: (713) 222-1475  
jcornwell@munsch.com  
tberghman@munsch.com

**CERTIFICATE OF SERVICE**

I hereby certify that this Motion was served via the Court’s CM/ECF electronic facilities on all parties registered to receive such notice. Further, I caused this Motion to be served by email on the Debtor, the Subchapter V Trustee, and the United States Trustee representatives in this case.

By: /s/ John D. Cornwell  
John D. Cornwell  
Texas Bar No. 24050450